



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

SHARI MEGHREBLIAN
COMMISSIONER

BILL HASLAM
GOVERNOR

June 12, 2018

Via Electronic Mail to CorpsLRNPlanningPublicCom@usace.army.mil

Attn: Joy Broach, Aquatic Biologist
Department of the Army
Nashville District, Corps of Engineers
110 9th Avenue South, Room A-405
Nashville, Tennessee 37203

Dear Ms. Broach:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the U.S. Army Corps of Engineers (USACE) – Nashville District, *J. Percy Priest (JPP) Reservoir, Tennessee Draft Water Supply Storage Reallocation Report and Integrated Environmental Assessment* (Draft Integrated Report and EA). USACE evaluates the potential impacts of a proposed reallocation of additional storage for water supply from JPP, Tennessee in Davidson and Rutherford Counties. The Draft Integrated Report and EA concludes that the tentatively selected plan to reallocate an additional 12,016 acre-feet (30.498 MGD) of storage would meet the water supply demand for the Town of Smyrna, the City of Murfreesboro, and Consolidated Utility District for municipal and industrial (M&I)'s with minimal impact to the reservoir and the environment.

Actions considered in detail within the Draft Integrated Report and EA include:

- **Tentatively Selected Plan.** The USACE Nashville District completed an evaluation of the anticipated needs of the M&I water supply users and the potential effects of the proposed storage reallocation volumes JPP1 –JPP4¹ and determined that storage in the reservoir could be reallocated to meet users' needs without seriously impacting the authorized purposes for which JPP is operated. The Tentatively Selected Plan (TSP) is to reallocate storage from the JPP conservation pool to meet a total demand of 75 MGD (JPP4). The Draft Integrated Report and EA summarized the potential impacts and outcomes of the TSP as follows:
 - The TSP would provide M&I water supply users with a safe and reliable supply of water to meet immediate and anticipated future needs.
 - The TSP would allow M&I water supply users to meet existing and future water supply requirements in a cost-effective manner.

¹ As part of the Draft Integrated Report and EA, USACE evaluated an Initial and Final Array of Action Alternatives for addressing water supply demand issues along JPP. The action alternatives evaluated by USACE included four scenarios for reallocating water from the conservation pool, JPP1 through JPP4. Each scenario proposed the reallocation of differing amounts of water from the conservation pool. Ultimately, JPP4 was selected from these Initial and Final Action Alternatives for further environmental and economic evaluation.

- The TSP would allow growth to continue in the region.
 - The TSP would establish a share of the operation, maintenance, repair, rehabilitation and replacement costs of JPP to be paid by M&I water supply users.
 - The TSP is environmentally sensitive to the natural resources in the project area and will not significantly impact any important natural or cultural resources or other elements of the human environment.
 - The TSP would not seriously affect the purposes for which JPP Dam and Reservoir was authorized, surveyed, planned or constructed, or involve major structural or operational changes to the project.
 - The reservoir drawdown that would be experienced is expected to be approximately one foot during a reoccurrence of the critical historical drought, which is within the normal operating range of the JPP Reservoir.
 - The TSP is consistent with the USACE Environmental Operating Principles.
- **No Action Alternative.** The No Action Alternative, also known as the “without-project” condition, is the most likely condition expected to exist in the future in the absence of the Tentatively Selected Plan, i.e., an additional reallocation of storage from JPP. In this case, the No Action Alternative means that additional conservation storage would not be reallocated to water supply and the operation of the reservoir would remain the same. The existing reallocation of storage from the JPP conservation pool to meet a demand of 44 MGD would remain. Users’ withdrawals from the reservoir will continue to grow until they are withdrawing amounts equal to the estimated yield of contracted storage. Sedimentation also will continue to occur in the reservoir. The remaining 122 ac-ft of storage recommended for reallocation in the 2003 report may be purchased by an entity. Since there would be no change in the operations of the reservoir, there would be no observable impacts to resources in the reservoir.

TDEC has reviewed the Draft EA and determined that it has no additional comments regarding the TSP or no action alternative at this time.² TDEC appreciates the opportunity to comment on this Draft Integrated Report and EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Kendra Abkowitz, PhD
 Assistant Commissioner, Office of Policy and Sustainable Practices
 Tennessee Department of Environment and Conservation
Kendra.Abkowitz@tn.gov
 (615) 532-8689

cc: Bill Avant, TDEC, TSP
 Mike Moore, TDEC, DOA
 Tom Moss, TDEC, DWR
 Stephanie Williams, TDEC, DNA

² TDEC concurs based on the range of alternatives evaluated by the Draft Integrated Report and EA, that the most appropriate alternative is the reallocation of additional conservation storage for anticipated growth for Murfreesboro, Smyrna and Consolidated Utility District of Rutherford County.